

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
RALEIGH DIVISION**

**IN RE:**

**CAH ACQUISITION COMPANY #1, LLC,  
d/b/a WASHINGTON COUNTY HOSPITAL,**

**CASE NO. 19-00730-5-JNC**

**Debtor,**

**CHAPTER 11**

**THOMAS W. WALDREP, JR., as  
LITIGATION TRUSTEE**

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)  
)  
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**Plaintiff,**

)  
)  
)

**ADVERSARY PROCEEDING  
NO. 22-00101-5-JNC**

**v.**

)  
)

**REBOOT, INC., d/b/a HIPAA GUARD,  
RURAL LAB OUTREACH, LLC, and  
MICHAEL REECE,**

)  
)  
)  
)

**Defendants.**

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**IN RE:**

**CAH ACQUISITION COMPANY #2, LLC,  
d/b/a OSWEGO COMMUNITY HOSPITAL,**

**CASE NO. 19-01230-5-JNC**

**Debtor,**

**CHAPTER 11**

**THOMAS W. WALDREP, JR., as  
LITIGATION TRUSTEE**

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**Plaintiff,**

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**ADVERSARY PROCEEDING  
NO. 22-00102-5-JNC**

**v.**

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**REBOOT, INC., d/b/a HIPAA GUARD,  
RURAL LAB OUTREACH, LLC, and  
MICHAEL REECE,**

)  
)  
)  
)

**Defendants.**

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**IN RE:**

**CAH ACQUISITION COMPANY #3, LLC,  
d/b/a HORTON COMMUNITY HOSPITAL,**

**CASE NO. 19-01180-5-JNC**

**Debtor,**

<b>THOMAS W. WALDREP, JR., as LITIGATION TRUSTEE</b>	)	<b>ADVERSARY PROCEEDING NO. 22-00103-5-JNC</b>
<b>Plaintiff,</b>	)	
<b>v.</b>	)	
<b>REBOOT, INC., d/b/a HIPAA GUARD, RURAL LAB OUTREACH, LLC, and MICHAEL REECE,</b>	)	
<b>Defendants.</b>	)	)

**IN RE:**

**CAH ACQUISITION COMPANY 6, LLC,  
d/b/a I-70 COMMUNITY HOSPITAL,**

**CASE NO. 19-01300-5-JNC**

**Debtor,**

<b>THOMAS W. WALDREP, JR., as CHAPTER 7 TRUSTEE</b>	)	<b>ADVERSARY PROCEEDING NO. 22-00104-5-JNC</b>
<b>Plaintiff,</b>	)	
<b>v.</b>	)	
<b>REBOOT, INC., d/b/a HIPAA GUARD, RURAL LAB OUTREACH, LLC, and MICHAEL REECE,</b>	)	
<b>Defendants.</b>	)	)

**IN RE:**

**CAH ACQUISITION COMPANY 7, LLC,  
d/b/a PRAGUE COMMUNITY HOSPITAL,**

**Debtor,**

**CASE NO. 19-01298-5-JNC**

**CHAPTER 11**

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THOMAS W. WALDREP, JR., as )  
LITIGATION TRUSTEE )  
Plaintiff, )  
v. )  
REBOOT, INC., d/b/a HIPAA GUARD, )  
RURAL LAB OUTREACH, LLC, and )  
MICHAEL REECE, )  
Defendants. )

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**ADVERSARY PROCEEDING  
NO. 22-00105-5-JNC**

**IN RE:**

**CAH ACQUISITION COMPANY 12, LLC,  
d/b/a FAIRFAX COMMUNITY HOSPITAL,**

**Debtor,**

**CASE NO. 19-01697-5-JNC**

**CHAPTER 11**

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THOMAS W. WALDREP, JR., as )  
LITIGATION TRUSTEE )  
Plaintiff, )  
v. )  
REBOOT, INC., d/b/a HIPAA GUARD, )  
RURAL LAB OUTREACH, LLC, and )  
MICHAEL REECE, )  
Defendants. )

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**ADVERSARY PROCEEDING  
NO. 22-00106-5-JNC**

**IN RE:**

**CAH ACQUISITION COMPANY 16, LLC,  
d/b/a HASKELL COUNTY COMMUNITY  
HOSPITAL,**

**CASE NO. 19-01227-5-JNC**

**Debtor,**

**CHAPTER 11**

<b>THOMAS W. WALDREP, JR., as LIQUIDATING TRUSTEE</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>ADVERSARY PROCEEDING</b>
	)	<b>NO. 22-00107-5-JNC</b>
	)	
<b>v.</b>	)	
	)	
<b>REBOOT, INC., d/b/a HIPAA GUARD, RURAL LAB OUTREACH, LLC, and MICHAEL REECE,</b>	)	
	)	
<b>Defendants.</b>	)	
	)	

**NOTICE OF APPEARANCE AND REQUEST FOR NOTICES AND DOCUMENTS**

Please take notice that, pursuant to Bankruptcy Rules 2002, 9007 and 9010, the undersigned is appearing on behalf of Reboot, Inc., d/b/a HIPAA Guard, Rural Lab Outreach, LLC, and Michael Reece, Defendants in this case. It is hereby requested as follows:

1. Matrix/Roster. The undersigned requests that an entry be made on the electronic matrix/roster of creditors to receive notice in this case maintained by the Clerk of the United States Bankruptcy Court.

2. Receipt of Notices. The undersigned requests to be served with all documents filed with the court and all notices which the court and/or other parties are required to serve. This request includes all papers, reports, orders, notices, copies of applications, motions, petitions, disclosure statements, plans of readjustment of debts or reorganization, pleadings, appendices, exhibits, requests or demands, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, electronic mail, courier service, delivery service, telephone, facsimile, telegraph, telex or otherwise.

3. No Express or Implied Acceptance of Service. This Notice of Appearance does not give express or implied consent by the undersigned or Womble Bond Dickinson (US) LLP to

accept service of process of any action commenced under Rule 7001 of the Federal Rules of Bankruptcy Procedure.

4. No Waiver of Rights. This Notice of Appearance shall not be deemed or construed to be a waiver of the rights of Defendants of the following:

- a. To have final orders in noncore matters entered only after *de novo* review by a United States District Judge;
- b. To trial by jury in any case or proceeding related to this case;
- c. To have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal or to seek abstention by the United States Bankruptcy Court on any matter; or
- d. To any other rights, remedies, claims, actions, defenses, setoffs, or recoupments to which Defendants are or may be entitled, in law or in equity, all of which are expressly reserved.

Dated: August 31, 2023

**WOMBLE BOND DICKINSON (US) LLP**

/s/ Jesse A. Schaefer

Jesse A. Schaefer  
NC State Bar No. 44773  
555 Fayetteville Street, Suite 1100  
Raleigh, NC 27601  
Telephone: (919) 755-8182  
Email: jesse.schaefer@wbd-us.com

*Counsel for Defendants Reboot, Inc. d/b/a/ HIPAA Guard, Rural Lab Outreach, LLC; and Michael Reece*

**CERTIFICATE OF SERVICE**

I, the undersigned, or Womble Bond Dickinson (US) LLP certifies:

That I am, at all times hereinafter mentioned was, more than eighteen (18) years of age;

That on this day, the foregoing Notice of Appearance and Request for Notices and Documents was served by electronic means through the court's CM/ECF service on:

Micah E. Marcus, Esq.  
John Van Swearingen, Esq.  
Attorneys for Plaintiff

I certify under penalty of perjury that the foregoing is true and correct.

Dated: August 31, 2023

**WOMBLE BOND DICKINSON (US) LLP**

By: /s/ Jesse A. Schaefer  
Jesse A. Schaefer

*Counsel for Defendants Reboot, Inc. d/b/a/ HIPAA  
Guard, Rural Lab Outreach, LLC; and Michael  
Reece*